

REC'D AUG 31 2016

IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF MISSOURI

ROBERT E. ALLEN 03738-043  
(full name) (Register No.)

16-3363-CV-S-GAF-P

Plaintiff(s).

Case No. \_\_\_\_\_

v.

TANEY COUNTY CIRCUIT COURT,  
(Full name)  
TANEY COUNTY SHERIFFS' DEPT.,  
JEFFREY M. MERELL, ETAL  
Defendant(s).

Defendants are sued in their (check one):

☐ Individual Capacity

☐ Official Capacity

☒ Both

COMPLAINT UNDER THE CIVIL RIGHTS ACT OF 42 U.S.C. § 1983

I. Place of present confinement of plaintiff(s): FCI-GREENVILLE  
P.O. Box 5000 GREENVILLE, IL 62246

II. Parties to this civil action:  
Please give your commitment name and any another name(s) you have used while incarcerated.

A. Plaintiff ROBERT E. ALLEN Register No. 03738-043  
Address FCI-GREENVILLE P.O. Box 5000  
GREENVILLE, IL 62246

B. Defendant TANEY COUNTY CIRCUIT COURT

Is employed as CIRCUIT COURT FOR TANEY COUNTY MO.  
@ 266 MAIN STREET FORSYTH MO 65653

For additional plaintiffs or defendants, provide above information in same format on a separate page.

## ADDITIONAL DEFENDANTS

II(R) CONT'D

DEFENDANT TANEY COUNTY SHERIFF'S DEPT. - EXTRADITION  
DIVISION (KIMBERLY SCHADE) WHOSE ADDRESS IS  
P.O. Box 1005 FORSYTH, MO 65653 AND PHONE  
NUMBER IS (417) 546-7250

DEFENDANT JEFFREY M. MERRELL - TANEY COUNTY  
PROSECUTOR WHOSE ADDRESS IS 266 MAIN STREET  
FORSYTH, MO 65653  
% THE 38<sup>th</sup> JUDICIAL CIRCUIT COURT, TANEY COUNTY, MISSOURI

- III. Do your claims involve medical treatment? Yes ☒ No ☐
- IV. Do you request a jury trial? Yes ☒ No ☐
- V. Do you request money damages? Yes ☒ No ☐
- State the amount claimed? \$1 million 1 million (actual/punitive)

VI. Are the wrongs alleged in your complaint continuing to occur? Yes ☒ No ☐

VII. Grievance procedures:

A. Does your institution have an administrative or grievance procedure?

(DOES NOT PERTAIN TO THIS FACILITY) Yes ☒ No ☐

B. Have the claims in this case been presented through an administrative or grievance procedure within the institution? Yes ☐ No ☒

C. If a grievance was filed, state the date your claims were presented, how they were presented, and the result of that procedure. (Attach a copy of the final result.)

D. If you have not filed a grievance, state the reasons.

(DOES NOT PERTAIN TO THIS FACILITY)

VIII. Previous civil actions:

A. Have you begun other cases in state or federal courts dealing with the same facts involved in this case? Yes ☐ No ☒

B. Have you begun other cases in state or federal courts relating to the conditions of or treatment while incarcerated? Yes ☐ No ☒

(NOT THIS ISSUE)

C. If your answer is "Yes," to either of the above questions, provide the following information for each case.

(1) Style: \_\_\_\_\_  
(Plaintiff) (Defendant)

(2) Date filed: \_\_\_\_\_

- (3) Court where filed: \_\_\_\_\_
- (4) Case Number and citation: \_\_\_\_\_
- (5) Basic claim made: \_\_\_\_\_
- (6) Date of disposition: \_\_\_\_\_
- (7) Disposition: \_\_\_\_\_  
(Pending) (on appeal) (resolved)
- (8) If resolved, state whether for: \_\_\_\_\_  
(Plaintiff or Defendant)

For additional cases, provide the above information in the same format on a separate page.

IX. Statement of claim:

- A. State here as briefly as possible the facts of your claim. Describe how each named defendant is involved. Include the names of other persons involved, dates and places. Describe specifically the injuries incurred. Do not give legal arguments or cite cases or statutes. You may do that in Item "B" below. If you allege related claims, number and set forth each claim in a separate paragraph. Use as much space as you need to state the facts. Attach extra sheets, if necessary. Unrelated separate claims should be raised in a separate civil action.

EACH DEFENDANT HAS BEEN INVOLVED IN THIS CASE SINCE JULY 2010 WHEN THE PLAINTIFF FIRST MADE CONTACT WITH MR. MERRELL THROUGH CORRESPONDENCE IN SEPTEMBER 2010 WHILE HOUSED AT THE CHRISTIAN COUNTY JAIL IN OZARK, MO. MANY ATTEMPTS TO RESOLVE THIS MATTER HAVE BEEN MADE TO PAY (\$1948.00) THIS OFF. TWO (2) ATTEMPTS BY PLAINTIFFS WIFE IN SEPTEMBER & NOVEMBER 2014 WERE MADE TO BRENDA NEAL (THEN CIRCUIT CLERK) AND THE TANEY COUNTY BAD CHECK DIVISION. PLAINTIFF HAS ALSO BEEN WITHIN (7) SEVEN MILES OF TANEY COUNTY, MO (HARRISON, AR) AND TANEY COUNTY REFUSED TO COME PICK THEM UP - 9/27/2015.

- B. State briefly your legal theory or cite appropriate authority:

MANY STATE OF MISSOURI LAWS, ETHICS LAWS, OBSTRUCTION OF JUSTICE, MALFEASANCE, MALFEASANCE IN OFFICE, AND SEVERAL LAWS HAVE BEEN BROKEN AND ABUSED BY THESE DEFENDANTS.

X. Relief: State briefly exactly what you want the court to do for you. Make no legal arguments.  
(1) \$1 MILLION ACTUAL DAMAGES (2) \$1 MILLION PUNITIVE DAMAGES  
(3) DISMISS "ALL" CHARGES (4) CLEAR "ALL WARRANTS" AGAINST  
THE PLAINTIFF

XI. Counsel:

A. If someone other than a lawyer is assisting you in preparing this case, state the person's name. NONE

B. Have you made any effort to contact a private lawyer to determine if he or she would represent you in this civil action? Yes ☐ No ☒

If your answer is "Yes," state the names(s) and address(es) of each lawyer contacted.

C. Have you previously had a lawyer representing you in a civil action in this court? Yes ☐ No ☒

If your answer is "Yes," state the name and address of the lawyer.

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this 27<sup>TH</sup> day of AUGUST 20 16

Robert E. Allen #03738-043  
Signature(s) of Plaintiff(s)

ROBERT ALLEN #03738-043  
FEDERAL CORRECTIONAL INSTITUTION  
P.O. Box 5000  
PEERVIEW, ILLINOIS  
62246

SAINT LOUIS MO 630

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REC'D AUG 31 2016

CLERK,  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF MISSOURI  
222 N. JOHN Q. HAMMONS PKWY  
SPRINGFIELD, MISSOURI

65806

LEGAL MAIL  
(MAILED 8/28/16)

65806-255950

